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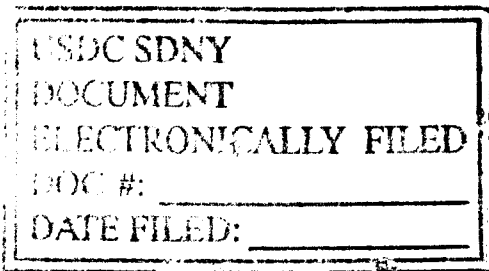
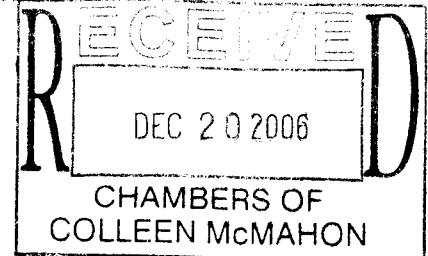
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P 88497-00016

Honorable Colleen McMahon
United States District Court
300 Quarropas Street
White Plains, NY 10601

NO

Re: *Shaw Family Archives, Ltd., et al. v. CMG Worldwide, Inc., et al.*, No.
05cv3939

Dear Judge McMahon:

We represent Marilyn Monroe LLC ("MMLLC") in this consolidated action. We respectfully submit this letter to update the Court on recent developments in a related action in California and to request a modification of the schedule in light of those and other developments.

On October 25, 2006, MMLLC moved for summary judgment against Shaw Family Archives ("SFA") on Count II of Plaintiffs' Complaint in this action. On November 30, 2006, SFA and Bradford Licensing, Inc. ("Bradford") served an opposition brief and cross-moved for summary judgment against MMLLC and CMG Worldwide, Inc. ("CMG") on Count II of MMLLC's and CMG's First Amended Complaint. At present, MMLLC's and CMG's reply papers and opposition papers are due on December 22, 2006.

As Your Honor is aware, a related consolidated action is pending in the United States District Court for the Central District of California involving MMLLC, CMG, and Anna Strasberg against Defendants/Counterclaim Plaintiffs Tom Kelley Studios, Inc. ("Kelley") and the Milton H. Greene Archives, Inc. ("Greene") (the "California Action"). Summary judgment motion practice is proceeding in that case as well. On December 11, 2006, the Honorable Margaret M. Morrow issued a tentative ruling on the Kelley and Greene's motion for summary judgment. In the tentative ruling, Judge Morrow indicated her intention to rule that Marilyn Monroe could not have devised her statutory Right of Publicity at the time of her death. If the tentative ruling becomes final, MMLLC will not have standing in the California Action to bring Right of Publicity claims on behalf of Marilyn Monroe. Given the enormous impact such a

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potential ruling could have on the California Action and MMLLC itself (not to mention on the rights of a broad class of persons, institutions, universities and charitable organizations), Judge Morrow directed the parties to submit additional briefs on the issue of whether Marilyn Monroe's will passed her Right of Publicity to her residuary beneficiaries. (The issue was only tangentially briefed, with no authorities cited, in the prior briefs submitted to Judge Morrow.) MMLLC's and CMG's supplementary brief was submitted yesterday, December 18, 2006. In MMLLC's supplemental brief, MMLLC asked Judge Morrow to rule that MMLLC has standing to pursue Marilyn Monroe's posthumous right of publicity claims. Kelley and Greene's supplemental brief is due December 29, 2006. Upon receipt and consideration of the supplemental briefs, Judge Morrow will issue a final decision.

Many of the issues presented in the California Action are presented in this action on the pending summary judgment motions. In fact, the issues raised in SFA's brief, dated November 30, 2006, are very similar to the issues raised in the briefs submitted by the Defendants/Counterclaim Plaintiffs in the California Action. For this reason, we respectfully submit that the interests of justice will best be served by deferring further summary judgment briefing in this action until Judge Morrow issues her final ruling. This will enable the parties to submit their arguments to this Court on the critical issues based upon a complete record, and will give this Court the opportunity to consider Judge Morrow's decision in its own deliberations in this action. Judge Morrow's history gives us good reason to believe that she will issue her final decision very promptly.

Accordingly, we respectfully request that MMLLC's reply and opposition papers be due two (2) weeks following the date on which Judge Morrow issues her decision. We believe that this proposal will assist the Court and the parties and will not unduly delay these proceedings. In the alternative, should the Court not wish to defer the briefing in the manner proposed, we respectfully request a two (2) week extension of the time to file our brief, from December 22, 2006 to January 5, 2007. This is MMLLC's second request for an extension to file its reply and opposition papers; the Court graciously granted MMLLC's previous request for a one week extension.

Finally, the Court's ruling on the summary judgment motions may greatly impact discovery in and the shape of this action. In addition, we are pleased to report that the parties have resolved their differences regarding the logistics of a mediation and are in the process of scheduling a mediation before JAMS in New York for mid-January. We are hopeful that the mediation will result in an amicable resolution. Because the final discovery deadline is currently scheduled for February 27, 2007, all of the parties respectfully request a further extension of the current discovery deadlines by a period of three (3) months on account of the above-described developments. We therefore respectfully request that the pretrial and trial dates be continued as follows:

- April 16, 2007 – Expert reports due

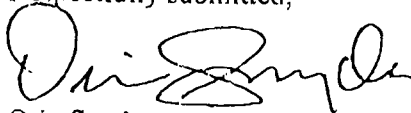
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- April 30, 2007 -- Rebuttal reports due
- May 28, 2007 -- Close of all fact and expert discovery
- July 2, 2007 -- Joint pre-trial order due

We thank the Court for its kind consideration of this request, which is the second request for a modification of the schedule in this action. We have spoken to David Marcus, counsel for SFA, and Jonathan Polak, counsel for Bradford, both of whom join this request.

Respectfully submitted,



Orin Snyder

OS/mmcc

cc: David Marcus
Jonathan Polak